

April 6, 2020

VIA ECF

REQUEST FOR ADJOURNMENT AND EXTENSION OF TIME
Conference of April 16, 2020 at 10:30 am

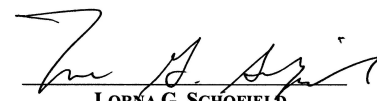
Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

APPLICATION GRANTED.

The initial conference set for April 16, 2020, at 10:30 A.M. is adjourned to May 14, 2020, at 10:30 A.M. The pre-conference materials are due on May 7, 2020. Defendants' time to answer or otherwise respond to the Complaint is adjourned to May 15, 2020.

Re: Eduardo v. 1st Class Staffing, et al
Case No. 20-CV-1557 (LGS)
Our File No. 01593.01465

Dated: April 8, 2020
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear Judge Schofield:

We are the attorneys for the Defendant 1st Class Staffing in the above-referenced action. We are seeking:

1. a one month adjournment of the initial pretrial conference scheduled for April 16, 2020 at 10:30 am, as set forth in your March 6, 2020 Order of (ECF No. 3);
2. An equivalent adjustment of the due date for the Joint Proposed Civil Case Management Plan and Scheduling Order until 5 days before the adjourned conference date.
3. Both defendants¹ are seeking an extension of time to answer or file a letter motion seeking a pre-trial conference until the due date of the new Joint Proposed Civil Case Management Plan and Scheduling Order

This is the first **request** for an adjournment. As a result of the current pandemic, there has been some confusion over service of the Plaintiff's Notice of a Lawsuit and Request to Waive Service of a Summons on co-defendant Lorenzo Food Group, Inc. Now that this confusion has been resolved, the parties have initiated settlement communications in earnest to see if it is possible to resolve this matter before a responsive pleading is required.

¹ Plaintiff continues to make best efforts to obtain service information for Defendant "Alex LNU." Counsel for 1st Class Staffing and Lorenzo Food do not represent that individual and both deny he was their employee.

Both defendants, 1st Class Staffing and Lorenzo, request this extension without prejudice to their assertion of a jurisdictional defense that this Court does not have personal jurisdiction over them.

Counsel for all parties have consented to the requests herein.

Thank you for your courtesy in this matter.

Respectfully submitted,

WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP

/s/

Steven L. Young

cc: Anamaria Segura, Counsel for Plaintiff (via ECF)
Jane Jacobs, Counsel for Lorenzo Food Group (via ECF and email)